

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

KATHY STEELE,
Administrator of the Estate of Robert David
Steele
-and-
EARTH INTELLIGENCE NETWORK, INC.
Plaintiff,
vs.
JASON GOODMAN,
Defendants

Case No.: 3:21-cv-00573-JAG

AFFIDAVIT OF JASON GOODMAN

I, Jason Goodman hereby affirm as follows:

1. I am over eighteen (18) years of age. I have never been convicted of a felony or any crime involving moral turpitude. I am competent to testify to the matters stated herein.
2. I have personal knowledge of each, and every statement made in this Affidavit and such statements are true and correct.
3. I make and submit this Affidavit in connection with the Motion for Rule 11 Sanctions.
4. This submission is not frivolous, not made in bad faith or for any improper purpose.
5. This filing complies with Federal Rules of Civil Procedure, and this Court's Local Rules.
6. This filing is made in good faith and for the reasons stated in the is accompanying memorandum in support pursuant to FRCP Rule 11(b)(1).

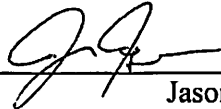
1 7. On September 18, 2023, I sent an email to counsel for Plaintiffs Steven Biss pursuant to
2 FRCP Rule 11 including a twenty-one-day safe harbor notification and the attached
3 memorandum in support of the motion for sanctions.
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5 8. Mr. Biss has not responded and has not addressed any of the matters raised in the motion.

6 9. Because of Plaintiffs' failure to respond and for the reasons stated in the memorandum in
7 support of the motion, I respectfully request the Court grant the motion for sanctions.
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9 Signed this 10th day of October 2023
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11 Respectfully submitted,
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